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6 Attorneys for Complainant

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8 BEFORE THE  
PHYSICIAN ASSISTANT EXAMINING COMMITTEE  
9 MEDICAL BOARD OF CALIFORNIA  
STATE OF CALIFORNIA  
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11 In the Matter of the Accusation Against:	}	No. 1E-91-9787	
12 <b>DEBORAH ANN BICKEL, P.A.</b>		}	<b>ACCUSATION</b>
13 2819 Piedmont Avenue			
14 Berkeley, CA 94705			
15 Physician Assistant License No. PA-11290			
16 Respondent.			

17 RAY DALE, Complainant herein charges and alleges as follows:

18 1. He is the Executive Officer of the Physician Assistant Examining  
19 Committee of the State of California (hereinafter "the Committee") and makes these  
20 charges and allegations solely in his official capacity.

21 **LICENSE HISTORY**

22 2. At all times material herein, respondent, Deborah Ann Bickel,  
23 P.A., (hereinafter "respondent") has held Physician Assistant License No. PA-11290  
24 issued to her by the Committee on or about February 22, 1983. Said license is  
25 presently paid and current with an expiration date of September 30, 1995. There is no  
26 Committee record of prior disciplinary action having been taken against respondent in  
27 the State of California.

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1 section also prohibits making a false statement in any prescription and prohibits  
2 assuming a false title or representing herself to be an authorized person for the  
3 purpose of obtaining controlled substances.

4 10. Section 125.3 provides, in pertinent part, that the Committee (see  
5 Bus. & Prof. Code § 22) may request the administrative law judge to direct the  
6 licentiate found to have committed a violation or violations of the licensing act to pay a  
7 sum not to exceed the reasonable costs of the investigation and enforcement of the  
8 case.

### 9 DRUGS

10 11. Vicodin contains hydrocodone bitartrate. Hydrocodone is also  
11 known as dihydrocodeinone. Vicodin is a dangerous drug as defined by Business and  
12 Professions Code section 4211 and is a Schedule III controlled substance pursuant to  
13 Health and Safety Code section 11056(e)(4).

14 12. Diazepam (valium) is a dangerous drug as defined by Business and  
15 Professions Code section 4211 and is a Schedule IV controlled substance pursuant to  
16 Health and Safety Code section 11057(d)(8).

17 13. Pen Vee K (penicillin V potassium) is a dangerous drug as defined  
18 by Business and Professions Code section 4211.

19 14. Sulymed Otic is a dangerous drug as defined by Business and  
20 Professions Code section 4211.

### 21 FIRST CAUSE FOR DISCIPLINE

22 15. In March and April 1991, respondent cashed the below-listed  
23 prescriptions for a fictitious patient named Carolyn Fairbrook.

24 <u>Date</u>	<u>Prescription No.</u>	<u>Drug</u>	<u>Quantity</u>
25 3/21/91	295553	Vicodin	#30
26 3/21/91	295554	Pen VK 250 mg	#40
27 4/6/91	298144	Diazepam 10 mg	#15

1	4/6/91	298145	Vicodin	#30
2	4/6/91	198155	Sulymed Otic	1 bottle

3 Those prescriptions were written on prescriptions with the heading of David Teegarden,  
4 M.D., who had employed respondent for about 8 years up until December 1990 when  
5 he terminated respondent. These prescriptions were filled out by respondent and were  
6 signed by respondent as Dr. Teegarden without Dr. Teegarden's permission or  
7 knowledge. Respondent obtained these controlled substances and dangerous drugs for  
8 self use and administration.

9 **FIRST CAUSE FOR DISCIPLINE**

10 16. Respondent's conduct as set forth in paragraph 15, above, has  
11 exposed her license to discipline for unprofessional conduct pursuant to Business and  
12 Professions Code sections 2234(e) and 2238 in conjunction with Health and Safety  
13 Code section 11173 in that respondent made false statements on the prescriptions by  
14 using the name of a fictitious patient and by signing Dr. Teegarden's name without his  
15 permission. Such conduct also constituted corrupt or dishonest acts.

16 **SECOND CAUSE FOR DISCIPLINE**

17 17. Respondent's conduct as set forth in paragraph 15, above, has  
18 exposed her license to discipline for unprofessional conduct pursuant to Business and  
19 Professions Code section 2234(3) and 2238 in conjunction with Health and Safety Code  
20 section 11173 in that respondent obtained controlled substances by fraud, deceit,  
21 misrepresentation, or subterfuge and/or concealed the material facts that Carolyn  
22 Fairbrook was a fictitious patient, that the controlled substances were, in fact, for  
23 respondent, and that Dr. Teegarden had not issued or signed the prescriptions. Such  
24 conduct also constituted corrupt or dishonest acts.

25 **THIRD CAUSE FOR DISCIPLINE**

26 18. Respondent's conduct as set forth in paragraph 15, above, has  
27 exposed her license to discipline for unprofessional conduct pursuant to section 2239 in

1 that respondent used or prescribed for or administered to herself controlled substances.

2 PRAYER

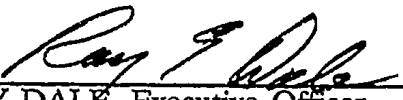
3 WHEREFORE complainant prays that the Physician Assistant Examining  
4 Committee hold a hearing on the matters alleged herein and, following said hearing,  
5 issue a decision:

6 1. Suspending or revoking physician assistant license number  
7 PA-11290 issued to Deborah Ann Bickel, P.A.;

8 2. Order respondent to pay reasonable costs of investigation and  
9 enforcement of this matter; and

10 3. Taking such other and further action as the Committee deems  
11 necessary and proper. .

12 DATED: May 2, 1995

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14 RAY DALE, Executive Officer  
15 Physician Assistant Examining Committee  
16 Medical Board of California

17 Complainant  
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